WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

MITCHELL M. WILLOUGHBY
JOHN M.S. HOEFER
RANDOLPH R. LOWELL**
TRACEY C. GREEN
BENJAMIN P. MUSTIAN**
ELIZABETH ZECK*
ELIZABETHANN LOADHOLT CARROLL
CHAD N. JOHNSTON
JOHN W. ROBERTS
R. WALKER HUMPHREY, II***
CHRISTOPHER M. CAMPBELL
ANDREW R. HAND****

ELIZABETH S. MABRY
JAMES PATRICK HUDSON
OF COUNSEL

JOSEPH H. FARRELL, III SPECIAL COUNSEL OFFICES:

COLUMBIA

930 RICHLAND STREET P.O. BOX 8416 COLUMBIA, SC 29202-8416

AREA CODE 803 TELEPHONE 252-3300 FAX 256-8062

CHARLESTON

151 MEETING STREET SUITE 325 P.O. Box 10 CHARLESTON, SC 29402

AREA CODE 843 TELEPHONE 619-4426 FAX 619-4430

January 12, 2018

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd Chief Clerk/Administrator **Public Service Commission of South Carolina** 101 Executive Center Drive Columbia, SC 29210

IN RE: South Carolinians Against Monetary Abuse (SCAMA) and Leslie Minerd, Complainants/Petitioners, v. South Carolina Electric & Gas Company, Defendant/Respondent. Docket No. 2017-346-E

Dear Ms. Boyd:

South Carolina Electric & Gas Company ("SCE&G" or the "Company") herein responds to the Opposition to SCE&G's "Motion to Dismiss" and Response to SCE&G's "Answer" to Request ("Opposition") filed by Ms. Leslie Minerd in the above-referenced matter. SCE&G asserts that the Opposition does not raise any new issues but merely restates the allegations, assertions, and requests for relief set forth in the previously filed Request. SCE&G further asserts that its Motion to Dismiss and Answer fully address the issues presented in the Opposition and, by this letter, herein incorporates, reasserts, and reaffirms those same arguments, positions, and defenses in reply to the Opposition. For the same reasons set forth in its Motion to Dismiss, SCE&G therefore respectfully requests that the Commission issue an order dismissing and/or granting judgment on the pleadings of the Request.

^{*}ALSO ADMITTED IN TEXAS

^{**}ALSO ADMITTED IN WASHINGTON, D.C.

^{***}ALSO ADMITTED IN CALIFORNIA

^{****}ALSO ADMITTED IN NORTH CAROLINA

The Honorable Jocelyn G. Boyd January 12, 2018 Page 2 of 2

By copy of this letter, we are serving all other parties of record with a copy of this letter and attach a certificate of service to that effect. If you have any questions regarding this matter or require anything further, please advise.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.

s/Benjamin P. Mustian

Benjamin P. Mustian

cc: Leslie Minerd (via first class mail and email)
Shannon Bowyer Hudson, Esquire (via first class mail and email)
K. Chad Burgess, Esquire (via email)